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Attorneys for Party-in-Interest
CITY OF MORGAN HILL

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☐ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**NOTICE OF NON-OPPOSITION TO
MOTION OF DEBTORS
PURSUANT TO 11 U.S.C. §§ 105(a),
361 AND 363 AND FED. R. BANKR.
P. 2002, 4001, AND 6004 FOR AN
ORDER (1) AUTHORIZING
DEBTORS TO (a) SELL,
TRANSFER, LEASE OR
OTHERWISE ENCUMBER REAL
PROPERTY, (b) ENTER INTO
ACQUISITION, LEASE, LICENSE,
AND PERMIT AGREEMENTS
RELATING TO THIRD PARTY
PROPERTY, AND (c) PURSUE AND
BRING EMINENT DOMAIN
PROCEEDINGS TO JUDGMENT OR
ENTER INTO SETTLEMENTS IN
LIEU THEREOF, SUBJECT TO
CERTAIN PROCEDURES AND
PARAMETERS, AND (II)
GRANTING RELATED RELIEF**

Date: April 10, 2019
Time: 1:30 pm
Courtroom: 17, 16th Floor
United States Bankruptcy Court
San Francisco, CA 94102

1 TO ALL INTERESTED PARTIES:

2 PLEASE TAKE NOTICE that the City of Morgan Hill, a party in interest in
3 this case, by and through their counsel Barton, Klugman & Oetting LLP, hereby
4 submit this statement of non-opposition to the motion of Debtors and Debtors in
5 Possession, for an Order Pursuant to 11 U.S.C. §§ 105(a), 361 and 363 and Fed. R.
6 Bankr. P. 2002, 4001, and 6004 for an Order (1) Authorizing Debtors to (a) Sell,
7 Transfer, Lease or Otherwise Encumber Real Property, (b) Enter Into Acquisition,
8 Lease, License, and Permit Agreements Relating to Third Party Property, and (c)
9 Pursue and Bring Eminent Domain Proceedings to Judgment or Enter Into
10 Settlements in Lieu Thereof, Subject to Certain Procedures and Parameters, and
11 (II) Granting Related Relief.

12
13 Dated: April 5, 2019

BARTON, KLUGMAN & OETTING LLP

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15 By: _____/s/_____

16 Terry L. Higham
17 A Professional Law Corporation
18 Attorney for Party-in-Interest
19 CITY OF MORGAN HILL
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